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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Parts 2 and 25 of the)
Commission's Rules to Permit Operation)
Of NGSO FSS Systems Co-Frequency with)
GSO and Terrestrial Systems in the Ku-)
Band Frequency Range;)
)
Amendment of the Commission's Rules to)
Authorize Subsidiary Terrestrial Use of the)
12.2-12.7 GHz Band by Direct Broadcast)
Satellite Licensees and Their Affiliates; and)
)
Applications of Broadwave USA,)
PDC Broadband Corporation, and)
Satellite Receivers, Ltd. to Provide)
A Fixed Service in the 12.2-12.7 GHz Band)

ET Docket No. 98-206
RM-9147
RM-9245

To: The Commission

COMMENTS OF PAXSON COMMUNICATIONS CORPORATION

Paxson Communications Corporation ("Paxson")¹ hereby joins in and supports the Joint Broadcaster Comments filed on March 12, 2001 by Benedek Broadcasting Corporation, Cooridor Television, L.L.P., Eagle III Broadcasting, LLC, Granite Broadcasting Corporation, and LIN Television Corporation (collectively Joint Broadcasters) in the above-captioned proceeding. Paxson, the owner of 65 television stations, encourages the Commission to expeditiously grant the waiver requests and license applications of Northpoint Technology, Ltd. and its local Broadwave affiliates (collectively, Northpoint).

For the reasons fully set forth in the Joint Broadcasters filing, Paxson believes that it is imperative that the Commission facilitate the introduction of another multi-channel video programming provider and another carrier of local television signals in this highly concentrated market to help benefit the public with price, service, and innovative competition as quickly as possible. Paxson notes that Northpoint and its local

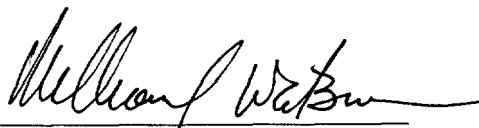
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List A B C D E

¹ Paxson Communications Corporation is the licensee through various subsidiaries of the television stations listed on Attachment I.

Broadware affiliates are committed to carrying the analog and digital signals of local television stations to the same extent required of cable systems by the FCC and Paxson believes that the final rules adopted by the FCC will mandate full digital must carry for all local stations. This will certainly provide additional competition in the multi-channel video programming market, will assist local television stations in their DTV transition efforts and strengthen the role of free, over-the-air television broadcasting.

Respectfully submitted,

Paxson Communications Corporation

By: 

William L. Watson

Vice President and Assistant Secretary

Paxson Communications Corporation
601 Clearwater Park Road
West Palm Beach, FL 33401-6233

Date: April 5, 2001

Paxson Communications Corporation Owned Television Stations

PCC Owned Stations (67)

CALL SIGN	CHANNEL	CITY, STATE	DMA (# OUT OF 211)
WPXN(TV)	31	New York, NY	New York, NY (1)
KPXN(TV)	43	San Bernardino, CA	Los Angeles, CA (2)
WCPX(TV)	38	Chicago, IL	Chicago, IL (3)
WPPX(TV)	61	Wilmington, DE	Philadelphia, PA (4)
KKPX(TV)	65	San Jose, CA	San Francisco-Oakland-San Jose, CA (5)
WPXB(TV)	60	Merrimack, NH	Boston, MA (6)
WBPX(TV)	68	Boston, MA	Boston, MA (6)
WPXG(TV)	21	Concord, NH	Boston, MA (6)
WDPX(TV)	58	Vineyard Haven, MA	Boston, MA (6)
KPXD(TV)	68	Arlington, TX	Dallas-Ft. Worth, TX (7)
WPXW(TV)	66	Manassas, VA	Washington, DC (8)
WWPX(TV)	60	Martinsburg, WV	Washington, DC (8)
WPXD(TV)	31	Ann Arbor, MI	Detroit, MI (9)
WPXA(TV)	14	Rome, GA	Atlanta, GA (10)
KPXB(TV)	49	Conroe, TX	Houston, TX (11)
KWPX(TV)	33	Bellevue, WA	Seattle-Tacoma, WA (12)
KPXM(TV)	41	St. Cloud, MN	Minneapolis-St. Paul, MN (13)
WXPX(TV)	66	Bradenton, FL	Tampa-St. Petersburg, FL (14)
WVPX(TV)	23	Akron, OH	Cleveland, OH (15)
WPXM(TV)	35	Miami, FL	Miami-Ft. Lauderdale, FL (16)
KBPX(TV)	13	Flagstaff, AZ	Phoenix, AZ (17)
KPPX(TV)	51	Tolleson, AZ	Phoenix, AZ (17)
KPXC-TV	59	Denver, CO	Denver, CO (18)
KSPX(TV)	29	Sacramento, CA	Sacramento-Stockton-Modesto, CA (19)
WOPX(TV)	56	Melbourne, FL	Orlando-Daytona Beach-Melbourne, FL (21)
WPXS(TV)	13	Mt. Vernon, IL	St. Louis, MO (22)
KPXG(TV)	22	Salem, OR	Portland, OR (23)
WIPX(TV)	63	Bloomington, IN	Indianapolis, IN (26)
WHPX(TV)	26	New London, CT	Hartford & New Haven, CT (27)
WFPX(TV)	62	Fayetteville, NC	Raleigh-Durham, NC (29)
WRPX(TV)	47	Rocky Mount, NC	Raleigh-Durham, NC (29)
KPXE(TV)	50	Kansas City, MO	Kansas City, MO (30)
WNPX(TV)	28	Cookeville, TN	Nashville, TN (31)
WPXE(TV)	55	Kenosha, WI	Milwaukee, WI (33)
KUPX(TV)	16	Provo, UT	Salt Lake City, UT (36)
KPXL(TV)	26	Uvalde, TX	San Antonio, TX (37)
WZPX(TV)	43	Battle Creek, MI	Grand Rapids-Kalamazoo-Battle Creek, MI (38)
WPXH(TV)	44	Gadsden, AL	Birmingham, AL (39)
WPXV(TV)	49	Norfolk, VA	Norfolk-Portsmouth-Newport News, VA (41)
WPXP(TV)	67	Lake Worth, FL	West Palm Beach-Ft. Pierce, FL (43)

CALL SIGN	CHANNEL	CITY, STATE	DMA (# OUT OF 211)
WPXJ-TV	51	Batavia, NY	Buffalo, NY (44)
KOPX(TV)	62	Oklahoma City, OK	Oklahoma City, OK (45)
WGPX(TV)	16	Burlington, NC	Greensboro-High Point-Winston Salem, NC (47)
WPXQ(TV)	69	Block Island, RI	Providence, RI - New Bedford, MA (49)
KAPX(TV)	14	Albuquerque, NM	Albuquerque-Santa Fe, NM (50)
WQPX(TV)	64	Scranton, PA	Wilkes Barre-Scranton, PA (52)
WBSG-TV	21	Brunswick, GA	Jacksonville, FL (53)
KPXF(TV)	61	Porterville, CA	Fresno-Visalia, CA (54)
WYPX(TV)	55	Amsterdam, NY	Albany-Schenectady-Troy, NY (56)
KTPX(TV)	44	Okmulgee, OK	Tulsa, OK (59)
WLPX-TV	29	Charleston, WV	Charleston-Huntington, WV (61)
WPXK(TV)	54	Jellico, TN	Knoxville, TN (63)
WPXR(TV)	38	Roanoke, VA	Roanoke-Lynchburg, VA (68)
KFPX(TV)	39	Newton, IA	Des Moines-Ames, IA (70)
KPXO(TV)	66	Kaneohe, HI	Honolulu, HI (72)
KPXJ(TV)	21	Minden, LA	Shreveport, LA (76)
KGPX(TV)	34	Spokane, WA	Spokane, WA (77)
WMPX(TV)	23	Waterville, ME	Portland-Auburn, ME (79)
WSPX(TV)	56	Syracuse, NY	Syracuse, NY (80)
KPXR(TV)	48	Cedar Rapids, IA	Cedar Rapids-Waterloo & Dubuque, IA (89)
WPXU-TV	35	Jacksonville, NC	Greenville-New Bern-Washington, NC (106)
WEPX(TV)	38	Greenville, NC	Greenville-New Bern-Washington, NC (106)
WTPX(TV)	46	Antigo, WI	Wausau-Rhineland, WI (136)
WJPX(TV)	24	San Juan, PR	Not Covered by a DMA
WKPV(TV)	20	Ponce, PR	Not Covered by a DMA
WJWN(TV)	38	San Sebastian, PR	Not Covered by a DMA
WPXO(TV)	15	Christiansted, VI	Not covered by a DMA